

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CONNECTU LLC

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO  
SAVERIN, DUSTIN MOSKOVITZ, ANDREW  
MCCOLLUM, CHRISTOPHER HUGHES, and  
THEFACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG, and THEFACEBOOK,  
INC.,  
Counterclaimants,

v.

CONNECTU LLC,  
Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,  
Additional Defendants on Counterclaims.

Civil Action No. 1:04-CV-11923 (DPW)

District Judge Douglas P. Woodlock

**[PROPOSED] ORDER GRANTING DEFENDANTS' JOINT MOTION TO COMPEL  
TESTIMONY FROM CONNECTU LLC RESPONSIVE TO DEFENDANTS'  
AMENDED 30(B)(6) NOTICE**

For the reasons fully set forth in Defendants' Joint Motion to Compel Testimony from ConnectU LLC Responsive to Defendants' Amended 30(b)(6) Notice, the Court finds that ConnectU has not provided testimony and deponents required by Federal Rule of Civil Procedure 30. Accordingly, Defendants' having demonstrated GOOD CAUSE,

IT IS HEREBY ORDERED:

Defendants' Joint Motion to Compel Testimony from ConnectU LLC Responsive to Defendants' Amended 30(b)(6) Notice is GRANTED, and ConnectU is hereby ORDERED;

1. ConnectU shall make a conscientious good-faith endeavor to designate the persons having knowledge of the matters sought and to prepare those persons in order that they can answer fully, completely, invasively, the questions posed as to the relevant subject matters, for at least an additional four hours;
2. ConnectU's counsel shall not improperly object to the form of the question by either suggesting what he apparently believe to be an appropriate answer to his client or himself testifying, or to act as intermediary, interpreting questions, and deciding which questions the witness should answer, or to make other improper objections; and
3. ConnectU shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, for topics 7, 8 and 9 in Defendants' 30(b)(6) notice.

The Rule 30(b)(6) deposition referenced above shall take place on or before \_\_\_\_\_, 2005, unless otherwise agreed by the parties.

IT IS SO ORDERED

Dated: \_\_\_\_\_, 2005

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Hon. Douglas P. Woodlock